

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

ROBERT EDGAR, Individually and On)
Behalf of All Others Similarly Situated,)
Plaintiff,)
v.) Case No. 4:17-cv-01372
ANADARKO PETROLEUM)
CORPORATION, R.A. WALKER, and)
ROBERT G. GWIN,)
Defendants.)

STIPULATION AND [PROPOSED] ORDER

WHEREAS, on June 19, 2018, the Court granted Defendants' motion to dismiss the Corrected Amended Class Action Complaint without prejudice and with leave to amend by August 3, 2018;

WHEREAS, on August 3, 2018, Lead Plaintiff Iron Workers Benefit and Pension Fund—Iron Workers District Counsel Philadelphia & Vicinity filed its Second Amended Class Action Complaint in which two new Defendants, David McBride and John Christiansen, were added;

WHEREAS, on August 8, 2018, Messrs. McBride and Christiansen accepted service of the Second Amended Class Action Complaint through undersigned counsel:

THE PARTIES HAVE STIPULATED AND AGREED to, and respectfully request that the Court approve, the following schedule:

1. Defendants shall answer, move against, or otherwise respond to the second amended complaint by October 9, 2018;

2. If Defendants move to dismiss the second amended complaint, Lead Plaintiff shall have sixty (60) days from the filing of such motion in which to file any opposition papers. If Lead Plaintiff files opposition papers, Defendants shall have thirty (30) days from the filing of Lead Plaintiff's opposition papers in which to file reply papers;

3. Should any of the dates listed in the above periods fall on a Saturday, Sunday, or legal holiday, the period will continue to run until the end of the next day that is not a Saturday, Sunday, or legal holiday; and

4. Defendants expressly preserve, and do not waive, any and all rights and defenses, including but not limited to the assertion of jurisdictional defenses, either by motion or otherwise.

IT IS SO ORDERED:

Dated: _____

Hon. Lee H. Rosenthal
Chief United States District Judge

STIPULATED TO AND APPROVED BY:

THE ROSEN LAW FIRM, P.A.

/s/ Laurence Rosen

Laurence Rosen
Attorney-in-Charge
(*Admitted Pro Hac Vice*)
lrosen@rosenlegal.com
Phillip Kim
(*Admitted Pro Hac Vice*)
pkim@rosenlegal.com
Jonathan Horne
(*Admitted Pro Hac Vice*)
jhorne@rosenlegal.com
275 Madison Avenue, 34th Floor
New York, New York 10116
Tel: (212) 686-1060
Fax: (212) 202-3827

Lead Counsel for Lead Plaintiff

MOTLEY RICE LLC

Meredith Bracey Weatherby
(*Admitted Pro Hac Vice*)
mweatherby@motleyrice.com
Marlon E. Kimpson
mkimpson@motleyrice.com
Joshua C. Littlejohn
jlittlejohn@motleyrice.com
28 Bridgeside Blvd.
Mount Pleasant, South Carolina 29464
Tel: (843) 216-9000
Fax: (843) 216-9450

Additional Counsel for Lead Plaintiff

**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**

/s/ Noelle M. Reed

Noelle M. Reed
Attorney-in-Charge
Texas Bar No.: 24044211
Southern District No.: 27139
noelle.reed@skadden.com
Skadden, Arps, Slate, Meagher & Flom LLP
1000 Louisiana Street, Suite 6800
Houston, Texas 77002
Tel: (713) 655-5122
Fax: (713) 483-9122

Of Counsel:

Jay B. Kasner
(*Admitted Pro Hac Vice*)
jay.kasner@skadden.com
Susan L. Saltzstein
(*Admitted Pro Hac Vice*)
susan.saltzstein@skadden.com
Skadden, Arps, Slate, Meagher & Flom LLP
4 Times Square
New York, New York 10036
Tel: (212) 735-3000
Fax: (917) 735-2000

Counsel for Defendants

**STECKLER GRESHAM
COCHRAN PLLC**

R. Dean Gresham
Texas Bar No.: 24027215
dean@stecklerlaw.com
Bruce W. Steckler
Texas Bar No.: 00785039
bruce@stecklerlaw.com
L. Kirstine Rogers
Texas Bar No. 24033009
krogers@stecklerlaw.com
12720 Hillcrest Road, Suite 1045
Dallas, Texas 75230
Tel: (972) 387-4040
Fax: (972) 387-4041

Liaison Counsel for Lead Plaintiff

August 10, 2018